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January 12, 2022

VIA ECF

Magistrate Judge Louis Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **Minhye Park v. David Kim, M.D.**
Docket: 1:20-CV-02636(PC)
Our File: 778-1018

Dear Judge Bloom:

Please recall that our firm represents Dr. David Kim in the above referenced matter. I write to request additional time to complete fact discovery, including the deposition of our client, Dr. Kim. The current deadline is January 14, 2022.

On January 5th and 6th, 2022, we conducted the deposition of plaintiff, Minhye Park. In a good faith effort to move discovery in this matter, we proceeded with the deposition of Ms. Park despite the fact that plaintiff has yet to respond to several discovery demands, as previously addressed in our September 16, 2021 letter motion. (ECF Doc. 23.) To date, we have not received responses to the demands outlined in the letter motion. Defendant reserved his right to further depose Ms. Park upon receipt of outstanding discovery.

We are requesting additional time to complete fact discovery, specifically the deposition of Dr. Kim, due to my inability to meet with Dr. Kim in person due to a medical condition. I have contacted plaintiff's counsel and she consented to an adjournment of the deposition to January 26, 2022.

We respectfully request that the deadline for all outstanding documentary discovery be extended until January 28, 2022. Furthermore, we ask that the previously set deadline of January

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HEIDELL, PITTONI, MURPHY & BACH, LLP

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28, 2022 for defendant to file a motion to dismiss if plaintiff does not comply with this Court's prior order to respond to outstanding discovery demands be extended to February 4, 2022.

We thank Your Honor for your consideration of these requests.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "AJG" or similar, written in a cursive style.

Alejandra R. Gil

ARG/bv

cc: **VIA ECF**

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